REMARKS

Upon entry of the present amendment, claims 1-22 will remain pending in this application. Applicant respectfully submits that no new matter is added in the present amendment.

In the outstanding Office Action, the specification is objected to due to informalities. Claims 1-22 also stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over United States Patent No. 6,349,269 ("Broder") in view of United States Patent No. 5,721,788 ("Powell") and further in view of United States Patent No. 6,658,423 ("Pugh") . Applicant respectfully traverses the rejections.

Specification

The specification is objected to due to informalities. In particular, the Office Action alleges that the specification (Pg. 5, ll. 11-13) incorrectly cites Broder by stating that the "parameter choice were made because the desired similarity threshold for near-duplicate documents was .95." However, Applicant respectfully notes that this portion of the specification is not *citing* Broder. Rather, this portion of the specification is merely explaining Applicant's understanding of some of the reasoning behind some of the work relating to the Alta Vista search engine. Thus, there is no requirement that this reasoning be described or even mentioned in the Broder reference. Accordingly, withdrawal of the objections to the specification are respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-22 also stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over United States Patent No. 6,349,269 ("Broder") in view of United States Patent No. 5,721,788 ("Powell") and further in view of United States Patent No. 6,658,423 ("Pugh") . Applicant respectfully traverses the rejections.

Claims 1-10 and 17-20

Independent claims 1 and 17 recite that each supersample is compressed to a total number of bits of precision. The number of bits of precision is reduced from the number of

bits of precision used in the previous method by removing at least one of the most precise bits that were used in the previous method.

The Office Action (Pg. 4) states that Broder does not teach or suggest "wherein the number of bits of precision is reduced from a number of bits of precision used in the previous method." The Office Action also does not assert that Pugh teaches or suggest this feature. Rather, the Office Action cites Powell (Col. 3, ll. 35-48) as allegedly teaching this feature. Specifically, Powell (Col. 3, ll. 35-48) discloses a 16 bit signature, which contains a fewer number of bits than the 64 bit fingerprint of Broder (Col. 9, l. 15). However, Applicant respectfully notes that the signature of Powell differs in several respects from both the fingerprint of Broder and the claimed "supersamples." In particular, the number of bits in a fingerprint/supersample is ***not*** necessarily a function of how many samples were used to generate the fingerprint/supersample. By contrast, the number of bits in a signature is directly related to how many samples (*e.g,* signature points) are used to generate the signature (Broder, Col. 3, 43-48). Thus, for example, the 16 bit signature of Powell is ***not*** necessarily generated by making the 64 bit fingerprint of Broder less precise (*e.g.,* by removing the 48 most precise bits of the 64 bit fingerprint). In fact, the 16 bit signature of Powell may actually be ***more*** precise than the 64 bit fingerprint of Broder depending upon how many samples were used to compile the 16 bit signature in comparison to how many samples were used to compile the 64 bit fingerprint. Additionally, it cannot even be said that a 16 bit signature is generated by making a 64 bit signature less precise (*e.g.,* by removing the 48 most precise bits of the 64 bit signature). Rather, the 16 bit signature is generated using fewer samples (*e.g.,* signature points) than are used to generate the 64 bit signature. Thus, the 16 bit signature may actually be ***more*** precise than a 64 but signature.

Thus, the cited references do not teach or suggest "wherein the number of bits of precision is reduced from a number of bits of precision used in the previous method by removing at least one of the most precise bits of the supersample that were used in the previous method" as recited in independent claims 1 and 17. Accordingly, Applicant respectfully submits that independent claims 1 and 17 are patentable over the cited references. Applicant further submits that dependent claims 2-10 and 18-20 are patentable at least by reason of their dependency.

Claims 11-16, 21 and 22

Independent claims 11, 14, 21 and 22 recite that each supersample is compressed to 16 bits of precision by removing each bit of the supersample other than the 16 least precise bits of the supersample.

The Office Action analogizes the 16 bit signature of Powell to the claimed 16 bit supersample. However, as set for the above, the 16 bit signature of Powell is not compressed to 16 bits of precision by removing each bit other than the 16 least precise bits of the supersample. In fact, the 16 bit signature of Powell may actually be more precise than a signature that includes more than 16 bits (*e.g.,* a 64 bit signature).

Thus, the cited references do not teach or suggest "compressing each supersample to 16 bits of precision by removing each bit of the supersample other than the 16 least precise bits of the supersample " as recited in independent claims 11, 14, 17 and 22. Accordingly, Applicants respectfully submits that independent claims 11, 14, 17 and 22 are patentable over the cited references. Applicant further submits that dependent claims 12, 13, 15 and 16 are patentable at least by reason of their dependency. Accordingly, reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections are respectfully requested.

CONCLUSION

In view of the above amendments and remarks, Applicant respectfully submits that the present application is in condition for allowance. In view of the above amendments and following remarks, Applicant respectfully requests reconsideration of the present application.

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